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November 16, 2011

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Via Electronic Filing

Re: MB Dkt 09-182, 2010 Quadrennial Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996

Dear Ms. Dortch,

Pursuant to section 1.1206(b) of the Commission’s rules, Free Press submits this notice regarding an *ex parte* communication in the above referenced proceeding.

On November 14, 2011, Matt Wood, Derek Turner and Corie Wright of Free Press met with Joshua Cinelli, Media Advisor to Commissioner Michael Copps.

The topic of the meeting was the Commission’s pending 2010 Quadrennial Media Ownership Review and the order of the U.S. Court of Appeals for the Third Circuit in *Prometheus Radio Project v. FCC*, 652 F.3d 431 (3d Cir. 2011) (“Prometheus II”). In *Prometheus II*, the Third Circuit vacated the Commission’s 2007 decision to relax its newspaper-broadcast cross ownership rule. The court affirmed the Commission’s decision to retain its other media ownership limits, as well as the constitutionality of the rules themselves. It also chastised the Commission for again failing to “consider the effect of its rules on minority and female ownership.” *Id.* at 417.

Free Press reiterated that maintaining or tightening, and either event, *enforcing* the ownership limits would best promote diversity, localism, competition and efficient use of the broadcast spectrum – the public interest goals that lie at the heart of the Commission’s Quadrennial Media Ownership review. In particular, Free Press expressed support for retaining the newspaper-broadcast cross-ownership rule that was reinstated by the Third Circuit in *Prometheus II*. Free Press also emphasized that sound policy making, as well as the directive of the Third Circuit, require the FCC to evaluate the impact of its media ownership rules and policies on broadcast ownership opportunities for women and people of color.

In accordance with the Commission’s rules this *ex parte* notice is being filed electronically in the above referenced docket. If you have any questions regarding this filing, please do not hesitate to contact me.

Respectfully
submitted,

_____/s/_____
Corie Wright
Policy Counsel
Free Press
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202-265-1490

Cc:
Joshua Cinelli